

UNITED STATES DISTRICT COURT

DISTRICT OF NEW MEXICO

STATE OF NEW MEXICO *EX REL.*
HECTOR BALDERAS, ATTORNEY
GENERAL,

The State,

v.

TINY LAB PRODUCTIONS; TWITTER
INC.; MOPUB, INC.; GOOGLE, INC.;
ADMOB, INC.; AERSERV LLC; INMOBI
PTE LTD.; APPLOVIN CORPORATION; and
IRONSOURCE USA, INC.

Defendants.

Case No. 1:18-CV-00854-MV-JFR

**JOINT STIPULATION AND PROPOSED
ORDER TO EXTEND DEFENDANT
GOOGLE’S DEADLINE TO RESPOND
TO THE COMPLAINT BY 30 DAYS**

The State of New Mexico, by Attorney General Hector Balderas (“the State”) on the one hand and defendants Google LLC (named as Google, Inc.) and AdMob Google Inc. (named as AdMob, Inc.) (“Google”) on the other, collectively “the Parties,” hereby stipulate as follows:

WHEREAS, the State filed its Complaint against Google and other defendants on September 11, 2018 (*see* Dkt. 1);

WHEREAS, on April 29, 2020, the Court granted in part and denied in part the motions to dismiss the action brought by Google and other defendants, in which order all of the claims against some of the defendants were dismissed without prejudice and some of the claims against Google were dismissed without prejudice (*see* Dkt. 87);

WHEREAS, the Parties and the nation are currently in the midst of an unprecedented crisis caused by COVID-19 that has significantly impacted the normal operation of counsel to the

Parties and their ability to perform their functions, including Google and its counsel being subject to strict shelter-in-place orders issued by state and local authorities;

WHEREAS, Google needs additional time to review with its counsel its options for proceeding in this action or attempting to resolve it; and

WHEREAS, in light of these concerns, the Parties hereto have agreed to seek an extension of the time provided under Fed. R. Civ. P. 12(a)(4) for Google to answer the surviving claims of the Complaint.

NOW, THEREFORE, IT IS HEREBY AGREED AND STIPULATED by the Parties as follows: Google's time under Fed. R. Civ. P. 12(a)(4) to answer the surviving claims of the Complaint is extended by 30 days to June 12, 2020.

Dated: May 6, 2020

Respectfully Submitted,

By: /s/ Allen Carney
Allen Carney

Allen Carney
acarney@cbplaw.com
Hank Bates
hbates@cbplaw.com
David Slade
dslade@cbplaw.com
CARNEY BATES & PULLIAM, PLLC
519 W. 7th St.
Little Rock, AR 72201
Telephone: 501.312.8500
Facsimile: 501.312.8505

Michael W. Sobol
msobol@lchb.com
LIEFF CABRASER HEIMANN & BERNSTEIN, LLP
275 Battery Street, 29th Floor
San Francisco, CA 94111-3339
Telephone: 415.956.1000

Nicholas Diamand
ndiamand@lchb.com
LIEFF CABRASER HEIMANN & BERNSTEIN, LLP
250 Hudson Street, 8th Floor
New York, NY 10013-1413
Telephone: 212.355.9500

Attorneys for Plaintiff

Dated: May 6, 2020

By: /s/ Anthony Weibell
Anthony Weibell

Anthony Weibell
Wilson Sonsini Goodrich & Rosati
650 Page Mill Road
Palo Alto, CA 94304
Phone: (650) 354-4134
Fax: (650) 493-6811
aweibell@wsgr.com

Richard L. Alvidrez
Miller Stratvert P.A.
P.O. Box 25687
Albuquerque, NM 87125
Phone: (505) 842-1950
Fax: (505) 243-4408
ralvidrez@mstlaw.com

Attorneys for Defendants Google LLC (named as Google, Inc.) and AdMob Google Inc. (named as AdMob, Inc.)

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: _____

United States District Judge/Magistrate